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BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC 20554

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AUG 20 2001

In the Matter of )

Amendment of Section 73.202(b) )

Table of Allotments )

FM Broadcast Stations )

(Noblesville, Indianapolis  
and Fishers, Indiana) )

MM Docket 01-143

RM - 10153

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

To: Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau

COMMENTS AND AMENDED PROPOSAL

INDY LICO, Inc. ("INDY"), licensee of Stations WGRL(FM), Noblesville, Indiana and WGLD(FM), Indianapolis, Indiana and S.C.I. Broadcasting, Inc. ("SCI"),<sup>1</sup> licensee of Station WQKC(FM), Seymour, Indiana ("Joint Parties"), by their counsel, hereby submit supporting comments and an amendment to the proposal set forth in Notice of Proposed Rule Making ("NPRM") in this proceeding. The NPRM proposed to reallocate Channel 230A from Noblesville to Fishers, Indiana as its first local service and modification of Station WGRL accordingly. In addition, the NPRM proposed to reallocate Channel 283B from Indianapolis to Noblesville to maintain first local service at Noblesville. The amendment herein proposes to change the site of WGRL at Fishers and change the community of license and site for Station WQKC from Seymour to Sellersburg, Indiana as its first local service. In support hereof, the Joint Parties state as follows:

- 
1. INDY and SCI have the same parent corporation.

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1. In its Petition for Rule Making, INDY proposed to change community of license for Station WGRL to provide a first local service to Fishers, Indiana (population 37,835 - - 2000 U.S. Census) at its current site and to replace the Noblesville service with higher class Station WGLD. INDY hereby reaffirms its interest in this proposal and restates that it will file the appropriate applications for Fishers and Noblesville to implement this proposal if granted and to construct the facility as authorized. INDY desires to change its site from Fishers to a preferred site which would provide service to a greater number of persons and is closer to Fishers. The site was not available for use at the time the Petition for Rule Making was filed due to a short spacing to WQKC, Seymour. However, the Seymour station has since changed its ownership (BTCH-20010214ABC) and is willing and desirous of changing its site and community of license to accommodate the new Fisher site.<sup>2</sup>

2. As indicated in the attached channel study, Channel 230A can be allotted to Fishers at the new site and provide a 70 dBu signal to Fishers. A gain/loss study is provided which indicates that at the proposed site, the population within the 70 dBu contour will have a net increase of 385,467 persons with no net change in area served. See Figure 4. The loss area will continue to receive at least five aural services. See Figures 4 and 5.

3. In its Petition, INDY provided a Tuck showing which demonstrated that Fishers is independent of Indianapolis. See Faye and Richard Tuck, 3 FCC Rcd 5374, 5378 (1988). No additional showing of independence is needed as a result of the proposed change in site. As to signal population coverage, the proposed 60 dBu contour will cover only 37.7% of the Indianapolis

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2. No change in the proposal for WGLD to serve Noblesville is proposed.

Urbanized Area. As to relative size and proximity, Fishers population is 5.17% of that of Indianapolis. Fishers is located 15 miles from Indianapolis.

**Station WQKC(FM)**  
**Seymour, Indiana**

4. SCI proposes to reallocate Channel 229B from Seymour to Channel 230A at Sellersburg, Indiana as its first local service under the guidelines set forth in Amendment of the Commission's Rules regarding Modification of FM and TV Authorizations to Specify a New Community of License, 4 FCC Rcd 4870 (1989), recons. granted in part, 5 FCC Rcd 7094 (1994). First, as indicated in the attached channel study, the proposed use of Channel 230A at Sellersburg is mutually exclusive with the current use of Channel 229B at Seymour. Second, Sellersburg (population 6,071, 2000 U.S. Census) is preferred under the allotment priorities for a first local service (Priority 3) over a second local service at Seymour (Priority 4) which will continue to be served by Station WZZB(AM), 1390 kHz and WJLR(FM), Channel 218B1. See Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1982), recons. denied, 56 RR 2d 448 (1984).

5. Sellersburg fully satisfies the requirements of a community. As indicated, it is listed in the U.S. Census as an incorporated community. Sellersburg is located within the Louisville, Kentucky Urbanized Area. Therefore, a Tuck showing is provided.

6. The Commission will consider eight factors in assessing the independence of a specified community: (1) the extent to which the community residents work in the larger metropolitan area, rather than the specified community; (2) whether the smaller community has its own newspaper or other media that covers the community's local needs and interests; (3) whether community leaders and residents perceive the specified community as being an integral part of, or separate from, the larger metropolitan area; (4) whether the specified community has its own local

government and elected officials; (5) whether the smaller community has its own telephone book provided by the local telephone company or zip code; (6) whether the community has its own commercial establishments, health facilities, and transportation systems; (7) the extent to which the specified community and the central city are part of the same advertising market; and (8) the extent to which the specified community relies on the larger metropolitan area for various municipal services such as police, fire protection, schools, and libraries. Faye and Richard Tuck, supra. All eight factors need not favor the applicant; however, if a majority of the factors demonstrate that the specified community is distinct from the urbanized area, the Commission will treat it as an independent community. Id.; Parker and Port St. Joe, Florida, 11 FCC Rcd 1095, ¶¶ 9-11 (1996) (finding that the proposed community was independent, although it lacked its own telephone directory and local newspaper, and was included in the urbanized area's market by Arbitron); accord Jupiter and Hobe Sound, Florida, 12 FCC Rcd 3570, ¶ 3 (1997) (citing Parker and Port St. Joe, Florida).

7. In this case, the evidence presented, evaluated in light of Commission precedent in other change of community allocation proceedings, abundantly supports a finding that Sellersburg is independent from Louisville, Kentucky.

(1) *Extent to Which the Residents of Sellersburg Work in the Town of Sellersburg.* According to the 1990 U.S. Census, the population of Sellersburg was 5,745. Based on the 2000 U.S. Census, the current population for the City is 6,071. Some of the major employers within the community are Century Industries, a manufacturer of mobile stages, bleachers, vendor equipment and other revenue generating equipment for city park and recreation departments, Vencore, a nursing home/medical facility, SerVend International, Inc., a manufacturer of ice machines for major bottling companies and Haas Cabinet Company, a manufacturer of cabinets. Each of these industries employ

hundreds of Sellersburg residents. As discussed below in (6), there are many other small businesses which employ local residents in Sellersburg.

(2) *Newspapers and Other Media.* *The Evening News* is a local newspaper serving the west Clark County area. The newspaper contains local news for the Town of Sellersburg, which include articles on topics such as local government, local business and community news, and contains numerous advertisements from Sellersburg businesses. In addition, a webpage is being maintained for the Town, <[www.sellersburg.com](http://www.sellersburg.com)>, that contains general information concerning Sellersburg. By accessing this webpage, residents and visitors can obtain general information concerning the Town's government as well as listings for the local businesses, religious and civic organizations and some community events. The webpage also serves as a place for advertising for local businesses. Sample pages from the Town's website are attached as Exhibit 2.

(3) *Community Leaders and Residents Perceive Themselves as Separate From Louisville.* According to the Town's Deputy Clerk/Treasurer, Michelle Eve, residents of Sellersburg perceive their community as being separate from the Louisville urbanized area. The Town of Sellersburg has its own unique identity and history that is separate from that of Louisville, and the residents take great pride in their town. There is no doubt that most residents, whether newcomers or descendants of pioneer settlers, prefer to preserve the remaining elements of Sellersburg's small town character and lifestyle, but the completion of Interstate 65 has spurred new residential and commercial development.

Located in Clark County, Sellersburg is located in southern Indiana near the state's border with Kentucky. The Town of Sellersburg was established in 1846, and formally

incorporated on November 10, 1890. The Town originally encompassed 15 square miles, but has annexed surrounding land to form present-day Sellersburg. See Exhibit 2.

(4) *Sellersburg Has Its Own Local Government and Elected Officials.*

Sellersburg's town government functions independently of any other governmental units. Sellersburg is governed by a five (5)-member elected Town Council. The President of the Town Council is currently Danny Yost, and each council member serve a 4-year term. The Town of Sellersburg also has a Town Clerk/Treasurer who oversees all administrative functions of the town government, and handles the daily operations of the Town. Sellersburg also has a number of town departments, boards, commissions and committees comprised of Town residents, such as Zoning and Planning Board, Parks and Recreation Board and Police Commissioners. See Exhibit 2.

(5) *The Town of Sellersburg Has Its Own Zip Code and Separate Business*

*Listings in the Telephone Directory.* The Town of Sellersburg has its own zip code, 47172. The U.S. Postal Service maintains a branch office in the Town of Sellersburg to serve its residents. Telephone listings for the Town of Sellersburg are found in a telephone directory for the greater Jeffersonville-Clarksville and Sellersburg area. However, the telephone directory contains a separate section for Sellersburg's business listings. See Exhibit 2.

(6) *Sellersburg Has Numerous Commercial Establishments and Its Own Health*

*Facilities.* There are over 100 small businesses located within the Town of Sellersburg, according to the Sellersburg business listing. A substantial number of these businesses identify with the community by using "Sellersburg" in their name, for example: Sellersburg Auto Sales, Sellersburg Florists, Sellersburg Heating and Air, Sellersburg Liquor, Sellersburg Lumber, Sellersburg Metals and Welding, Sellersburg Stone Company and Indiana Southern Bank of Sellersburg (formerly Sellersburg State Bank). There are other small businesses in Sellersburg including, Another Carpet

Company, Pure Green Grass Seeding and Sod Service, Hinton Corby Insurance, Swifty Gas Station, Anita Spring Water Company, El Ranchito Restaurant, Lloyd's Radiator Shop, M&M Office Products, Inc. and Silver Creek Hardware, all of which advertise on the Town's webpage. See Exhibit 2.

Moreover, there are several health care providers are located in the Town of Sellersburg. The majority of doctors in Sellersburg are family practitioners. However, there are a number of other specialists such as dentists, chiropractors, physical therapists and veterinarians. See Exhibit 2.

Residents enjoy excellent recreation facilities and a broad range of programs. The Town of Sellersburg has a local park, Speed Park, complete with a playground, picnic areas and a little league baseball field. Sellersburg also has a community pool. Sellersburg has another park, Wilkerson Park, which includes a Vietnam Veterans Memorial, dedicated to six Sellersburg men who died in the Vietnam War. The Sellersburg Parks and Recreation Board plans and sponsors a number of events and activities for residents of all ages. For example, the Town of Sellersburg hosts an annual event that celebrates Sellersburg's founding with a town fair called Sellersburg Celebrates. The Town of Sellersburg also has a little league parade in recognition of its youth athletic achievements. See Exhibit 2.

Sellersburg is also home to many churches and religious organizations, such as First Baptist Church of Sellersburg, Sellersburg United Methodist Church, Sellersburg Church of Christ, Saint Paul's Roman Catholic Church, Calvary Christian Church, Faith Community Church and Speed Memorial Church to name a few. See Exhibit 2 for more listings. There are some civic and service organizations in Sellersburg, including American Legion, Buckner Lodge and Boys and Girls Scouts.

(7) *Extent to which the community and the central city are part of the same advertising market.* The Town of Sellersburg has a telephone directory published by Ameritech (now SBC Communications). As stated above, the directory serves the greater Jeffersonville-Clarksville and Sellersburg areas. Businesses in Sellersburg advertise in the local newspaper which enable them to reach the residents of Sellersburg as well as residents in Jeffersonville. Advertising is also available through the local telephone directory and the Town of Sellersburg's webpage. Thus, the residents of Sellersburg do not need to travel to Louisville to seek out other media sources in order to find out what is happening in their community.

(8) *Sellersburg's Library is Governed by Clark County, but its Police and Fire Protection are Provided Independent of any other Jurisdiction.* Reading materials and public reference materials are made available to the community at the Sellersburg Public Library. The Sellersburg Public Library offers many activities and special programs for the entire family including, weekly story hours for children and adult programs throughout the year.

8. The Town's education system is provided through the West Clark Community School Corporation. The Town of Sellersburg has two elementary schools, a junior high school and a high school. Sellersburg also has a number of parochial schools and a local college, IVY Tech at Sellersburg, which completed a \$4 million expansion program.

9. The Town provides many municipal services to its residents. The Sellersburg Police Department employs 12 sworn full-time police officers and other civilian staff. The Sellersburg Police Department is an active part of the community and it sponsors programs, which keeps the residents actively involved with police departmental work. The Sellersburg fire and rescue department is a volunteer department with more than 30 volunteer firefighters and numerous civilian volunteers.



10. The Water and Sewer Department provides water and sanitation services, including a trash collection and recycling for Town residents. This department also handles road maintenance, drainage, litter control, signage and building maintenance for Town facilities.

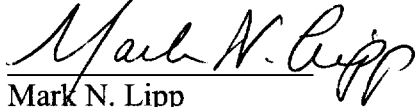
11. As to signal population coverage, the proposed 60 dBu contour will cover 59.5% of the Louisville Urbanized Area. As to relative size and proximity, Sellersburg is 2.4% the population of Louisville and is located 9.9 miles from Louisville.

12. The attached technical statement indicates that at the proposed site, the 60 dBu contour will cover 508,821 more persons with a net loss area of 6,028 sq. km. A showing of at least five aural services will be provided in a supplement. At this stage, it is known that there will be no white or gray areas created in the loss area. Another technical matter worth mentioning is that the current allotment of Channel 229B at Seymour is grossly short spaced to Station WFCJ, Miamisburg, Ohio by 63.87 km and slightly short spaced to Station WMMG-FM, Brandenburg, Kentucky. Elimination of the Miamisburg shortage will also eliminate significant areas of interference and overlap. See Indian Trail, North Carolina, DA 01-1660, released July 13, 2001. SCI hereby states that should the Commission grant this proposal, it will file an application for Sellersburg at the proposed site and construct the facility.

13. The Joint Parties propose first local services at Fishers and Sellersburg, Indiana and a large increase in the number of persons served. Accordingly, the Joint Parties urge the Commission to grant the instant proposal.

Respectfully submitted,

INDY LICO, INC.  
S.C.I. BROADCASTING, INC.

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Their Counsel

August 20, 2001

TECHNICAL EXHIBIT  
IN SUPPORT OF  
AMENDED PROPOSAL TO  
TO AMEND THE FM TABLE OF ALLOTMENTS  
NOBLESVILLE, FISHERS, INDIANAPOLIS,  
SEYMOUR AND SELLERSBURG, INDIANA

Technical Narrative

This technical narrative and associated exhibits have been prepared on behalf of WGRL, Channel 230A, Noblesville, Indiana and WGLD, Channel 283B, Indianapolis, Indiana in support of an amended proposal to amend Section 73.202(b) of the FCC Rules. Specifically, under the amended proposal, Channel 230A will be re-allotted from Noblesville, Indiana to Fishers, Indiana (WGRL) at a new reference point. To accommodate the Fishers allotment, it is proposed to re-allot Channel 229B from Seymour, Indiana to Channel 230A at Sellersburg, Indiana (WQKC). It is also proposed to concurrently re-allot Channel 283B from Indianapolis, Indiana to Noblesville, Indiana (WGLD). As each requested change is mutually exclusive with the existing allotment, Petitioner invokes the provisions of Section 1.420(i).

The following is a summary of the re-allotment proposal:

- The community of Fishers (2000 Census population 37,835 persons) will be provided with its first local aural transmission service.
- The community of Sellersburg (2000 Census population 6,071 persons) will be provided with its first local aural transmission service.
- Neither Noblesville (2000 Census population 28,590 persons), Indianapolis (2000 Census population 781,870 persons), nor Seymour (2000 Census population 18,101 persons) will be deprived of their sole "existing" local service.
- Although Fishers is located within the Indianapolis Urbanized Area as defined by the 1990 U.S. Census, as detailed elsewhere in this Petition, it is believed that Fishers warrants a first local service preference.

Noblesville, Fishers, Indianapolis, Seymour and Sellersburg, Indiana

- Although Seymour is located within the Louisville Urbanized Area as defined by the 1990 U.S. Census, as detailed elsewhere in this Petition, it is believed that Seymour warrants a first local service preference.
- In addition, the proposal will eliminate two short-spacings, one of significant magnitude, now existing for WQKC.

Proposed Change in Table of Allotments

Station WGRL is currently licensed (BLH-19930222KA) to operate on Channel 230A at Noblesville, Indiana. Noblesville has a 2000 Census population of 28,590 persons. There are currently no other FM or AM assignments at Noblesville. However, Petitioner proposes to re-allot Channel 283B to Noblesville. Therefore, adoption of the proposal will not deprive Noblesville of its sole "existing" local aural service.

Fishers, Indiana is located in Hamilton County and has a 2000 U.S. Census population of 37,835 persons. Fishers has no local FM or AM service. Therefore, Petitioner's proposal would bring a first local aural broadcast service to Fishers.

Seymour, Indiana is located in Jackson County and has a 2000 U.S. Census population of 18,101 persons. In addition to WQKC, Seymour is assigned WZZB(AM) (1390 kHz, 1 kW-LS) and WJLR(FM) (Channel 218B1). Therefore, adoption of the proposal will not deprive Seymour of its sole "existing" local aural service.

Sellersburg, Indiana is located in Clark County and has a 2000 U.S. Census population of 6,071 persons. Sellersburg has no local FM or AM service and, therefore, Petitioner's proposal would bring a first local aural broadcast service to Sellersburg.

Station WGLD is currently licensed (BLH-19940920KC) to operate on Channel 283B at Indianapolis, Indiana with an

Noblesville, Fishers, Indianapolis, Seymour and Sellersburg, Indiana

effective radiated power (ERP) of 50 kW and an antenna height above average terrain (HAAT) of 150 meters. Indianapolis has a 2000 Census population of 781,870 persons. In addition, to WGLD, there are currently 13 other FM stations and 7 AM stations licensed to Indianapolis.<sup>1</sup> Therefore, adoption of the proposal will not deprive Indianapolis of its sole "existing" local aural service.

Petitioner requests modification of the FM allocation table as follows:

<u>City</u>	<u>Present</u>	<u>Proposed</u>
Fishers, Indiana	--	230A
Indianapolis, Indiana	226B, 234B, 238B 242A, 277B, 283B 289B, 300B	226B, 234B, 238B 242A, 277B, 289B 300B
Noblesville, Indiana	230A	283B
Seymour, Indiana	(218B1), 229B	(218B1)
Sellersburg, Indiana	--	230A

#### Compliance With FCC Rules

The attached Figure 1 is a tabulation of required separations pertinent to use of Channel 230A at Fishers, Indiana. A new allotment reference point is proposed for Fishers. The use of the new allotment reference point necessitates the re-allotment of WQKC as described therein.

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<sup>1</sup> The FM stations are: WICR, Channel 204B; WJEL, Channel 207A; WFYI-FM, Channel 211B; WBDG, Channel 215A; WEDM, Channel 216A; WRFT, Channel 218A; WNOU, Channel 226B; WFBQ, Channel 234B; WFMS, Channel 238B; WHHH, Channel 242A; WRZX, Channel 277B; WYXB, Channel 289B; and WTPI, Channel 300B. The AM stations are: WBRI, 1500 kHz; WIBC, 1070 kHz; WNDE, 1260 kHz; WSYW, 810 kHz; WTLC, 1310 kHz; WMYS, 1430 kHz; WXLW, 950 kHz.

Noblesville, Fishers, Indianapolis, Seymour and Sellersburg, Indiana

Figure 2 is a map which depicts the city coverage (70 dBu) contours based on operation with maximum Class A facilities (ERP 6 kW/HAAT 100 m) and uniform terrain from the allotment reference site. As shown, all (100%) of Fishers is located within the 70 dBu contour. The Fishers city limits shown on Figure 2 were obtained from the 2000 US Census TIGER/Line files.

The attached Figure 6 is a tabulation of required separations pertinent to use of Channel 283B at Noblesville, Indiana. The allotment reference site is also the existing transmitter site of WGLD and, as indicated on Figure 6, operation on Channel 283B from this location complies with the Commission's minimum distance separation requirements contained in Section 73.207 of the FCC's rules to all existing, authorized and proposed stations and allotments.

Figure 7 is a map that depicts the city coverage (70 dBu) contours based on (1) operation with maximum Class B facilities (ERP 50 kW/HAAT 150 m) and uniform terrain from the allotment reference site and (2) based on operation with WGLD's licensed facilities (ERP 50 kW/HAAT 150 m) and actual terrain. As shown, all (100%) of Noblesville is located within the 70 dBu contours. The Noblesville city limits shown on Figure 7 were obtained from the 2000 US Census TIGER/Line files.

The attached Figure 8 is a tabulation of required separations pertinent to the use of Channel 230A at Sellersburg, Indiana. As indicated, the separation requirements are met with respect to all allotments and assignments.

Figure 9 is a map which depicts the city coverage (70 dBu) contour based on operation with maximum Class A facilities (ERP 6 kW/HAAT 100 m) and uniform terrain from the allotment reference site. As shown, all (100%) of Sellersburg is located within the 70 dBu contour. The Sellersburg city

limits shown on Figure 9 were obtained from the 2000 US Census TIGER/Line files.

#### Coverage of Urbanized Areas

An analysis was conducted of proposed coverage of the Fishers and Sellersburg proposals with respect to the proximate US Census defined Urbanized Areas for Indianapolis and Louisville, respectively. The Indianapolis reference point is located 17.5 km at a bearing of 232.9°True from the Fishers proposed allotment reference point. Likewise, the Louisville reference point is located 4.5 km at a bearing of 188.3°True from the proposed Sellersburg reference point.

The 1990 US Census urbanized areas were employed in the urbanized area analysis, as the 2000 Census urbanized area definitions are not yet available. As indicated in Figure 3, the amended Fishers proposal will provide predicted 70 dBu service to 37.7% of the 1990 Indianapolis urbanized area. Furthermore, as indicated in Figure 10, the Sellersburg proposal will provide predicted 70 dBu service to 59.5% of the Louisville urbanized area.

#### Gain and Loss Areas and Available Aural Services

An analysis of the gain and loss areas and available aural services was conducted for the Fishers proposal. As indicated in Figure 4, the proposal will result in a 60 dBu population gain of 1,068,194 (933 sq. km) and loss of 682,727 (933 sq. km). There will be a net 60 dBu population gain of 385,467. Population figures are based on 2000 US Census data.

Also shown on Figure 4 are other fulltime aural services. As indicated, there are 5 or more fulltime aural services available to all gain and loss areas. Figure 5 is a tabulation of stations employed in the determination of available aural services.

An analysis of the gain and loss areas was also conducted for the Sellersburg proposal. As indicated in Figure 11, the proposal will result in a 60 dBu population gain of 893,620 (2,461 sq. km) and loss of 384,799 (8,489 sq. km). There will be a net 60 dBu population gain of 508,821. Population figures are based on 2000 US Census data.

An analysis of other fulltime aural services within the gain and loss areas for the Sellersburg proposal was conducted. It was determined that no "white" (0 aural service) or "gray" (1 aural service) areas would be created within the loss area, nor would any "white" or "gray" areas be served within the gain area.

#### Coverage Contours

The FM predicted 70 dBu coverage contours were calculated in accordance with the provisions of Section 73.313, presuming both "uniform" and "actual" terrain, as described above.

#### Elimination of Short-Spacings

Figure 12 is an allocation study for the existing WQKC facility. As indicated therein, the WQKC facility currently suffers short-spacings with respect to two facilities: 1. WMMG-FM, Brandenburg-KY, Channel 228A (3.3 km short); and 2. WFCJ, Miamisburg, OH, Channel 229B (63.9 km short). The instant proposal will eliminate both short-spacings. It is worthy of note that given the magnitude of the short spacing with respect to WFCJ, a co-channel Class B station, its elimination will undoubtedly remove a significant source of interference with respect to that station.



Noblesville, Fishers, Indianapolis, Seymour and Sellersburg, Indiana

Conclusion

Channel 230A can be re-allotted from Noblesville, Indiana to Fishers, Indiana in compliance with all applicable Commission rules. Channel 283B can be re-allotted from Indianapolis, Indiana to Noblesville, Indiana in compliance with all applicable Commission rules. And Channel 229B can be re-allotted from Seymour, Indiana to Sellersburg, Indiana in compliance with all applicable Commission rules. The proposal will provide a first local aural service to Fishers and Sellersburg and will not deprive Noblesville, Indianapolis or Seymour of their sole local broadcast service. The proposal will result in significant predicted 60 dBu net service population gains with no loss of service to any underserved areas. Finally, the proposal will eliminate two existing short-spacings with respect to WQKC, one of a significant magnitude.

Louis Robert du Treil, Jr.

du Treil, Lundin & Rackley, Inc.  
201 Fletcher Avenue  
Sarasota, Florida 34237-6019  
(941) 329-6000

August 20, 2001

Figure 1

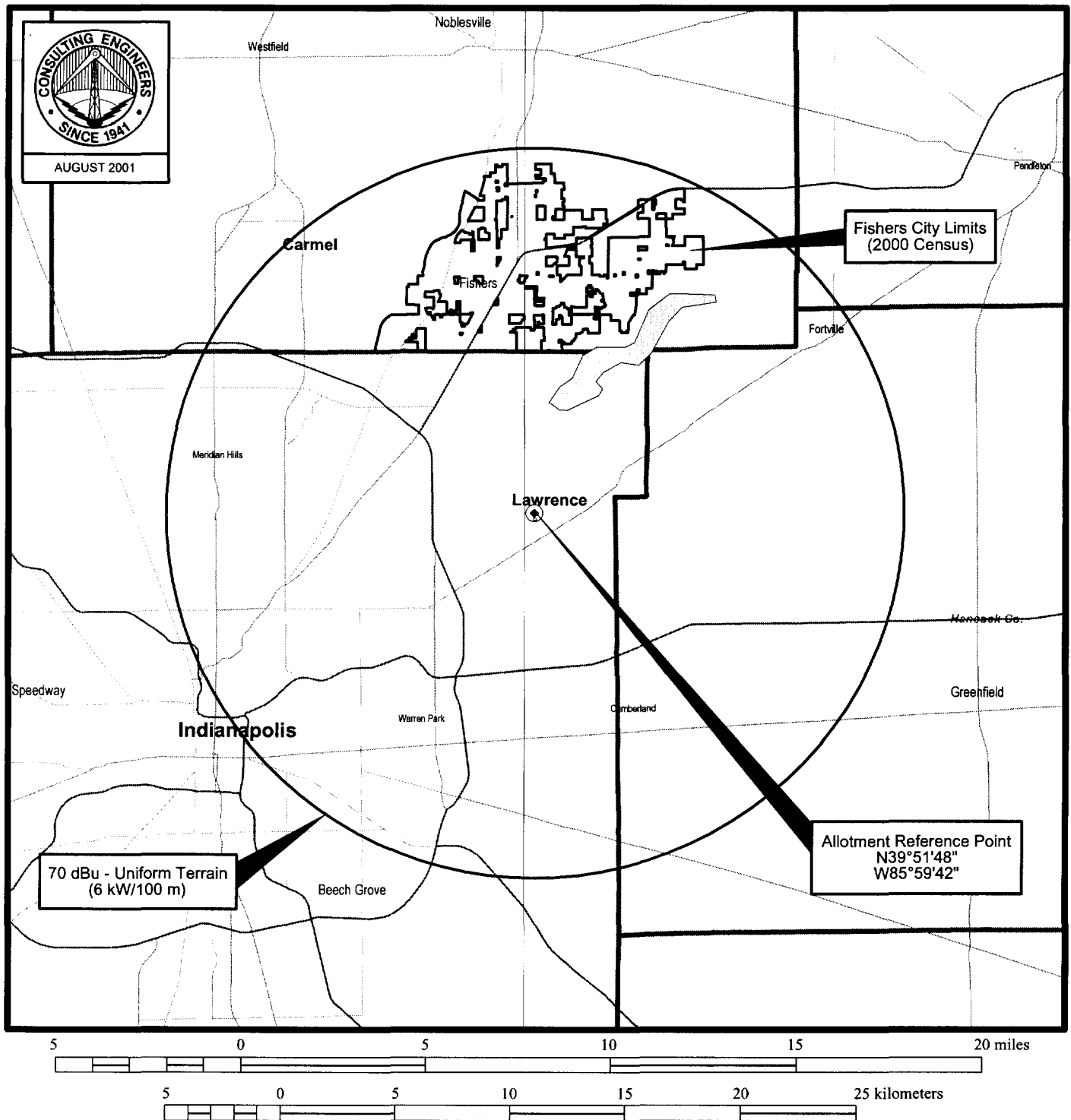
CDBS FM SEPARATION STUDY

Job Title: Proposed WGRL, Ch. 230A, Fishers, IN  
Channel: 230 A

Separation Buffer: 25 km  
Coordinates: 395148 855942

Call Id	City St	File Status Num	Channel Freq	ERP HAAT	DA Id	Latitude Longitude	73 215	Bear	Dist. (km)	Req. (km)
WFRR 11041	WALTON IN	BLH LIC C 19951120KB	229 A 93.7	6.000 100	N	40-43-31 086-10-33	N	351.0	96.94 24.94	72.0 Clear
WQKC 58380	SEYMOUR IN	BLH LIC C 19920803KC	229 B 93.7	25.000 213	N	38-58-22 086-10-03	N	188.6	99.98 -13.02	113.0 Short
<i>(WQKC to migrate to Channel 229A and move to Sellersburg, IN.)</i>										
WQKC 58380	SELLERSBURG IN		229 B 93.7	0.000		38-58-22 086-10-03		173.1	175.40 62.40	113.0 Clear
<i>(WQKC proposal to migrate to Channel 229A and move to Sellersburg, IN.)</i>										
WGRL 71438	NOBLESVILLE IN	BLH LIC C 19930222KA	230 A 93.9	2.750 150	N	40-00-55 085-58-58	N	3.5	16.90 -98.10	115.0 Short
<i>(Existing WGRL operation. Requested re-allotment of Channel 230A to Fishers, Indiana is mutually-exclusive with existing WGRL operation on Channel 230A at Noblesville, Indiana.)</i>										
0	NOBLESVILLE IN	RM DEL C 10153	230 A 93.9	0.000		40-00-55 085-58-58		3.5	16.90 -98.10	115.0 Short
<i>(Original Fishers/Noblesville proposal.)</i>										
0	FISHERS IN	RM ADD C 10153	230 A 93.9	0.000		40-00-55 085-58-58		3.5	16.90 -98.10	115.0 Short
<i>(Original Fishers/Noblesville proposal.)</i>										
WPFR-F 73712	CLINTON IN	BLD LIC C 20000605ABI	230 A 93.9	2.350 161		39-33-01 087-28-32	N	255.1	131.64 16.64	115.0 Clear
WKWH-F 54151	RUSHVILLE IN	BPH APP C 19990816IJ	232 A 94.3	0.740 171	N 30840	39-42-22 085-29-41	N	112.1	46.27 15.27	31.0 Close
WKWH-F 54151	RUSHVILLE IN	BMLH LIC C 20000913AAR	232 A 94.3	1.050 171	N 30215	39-42-22 085-29-41	N	112.1	46.27 15.27	31.0 Close
WGLD 28609	INDIANAPOLI IN	BLH LIC C 19940920KC	283 B 104.5	50.000 150	N	39-50-25 086-10-34	N	260.6	15.71 0.71	15.0 Close
0	NOBLESVILLE IN	RM ADD C 10153	283 B 104.5	0.000		39-50-25 086-10-34		260.6	15.71 0.71	15.0 Close
0	INDIANAPOLI IN	RM DEL C 10153	283 B 104.5	0.000		39-50-25 086-10-34		260.6	15.71 0.71	15.0 Close

Figure 2

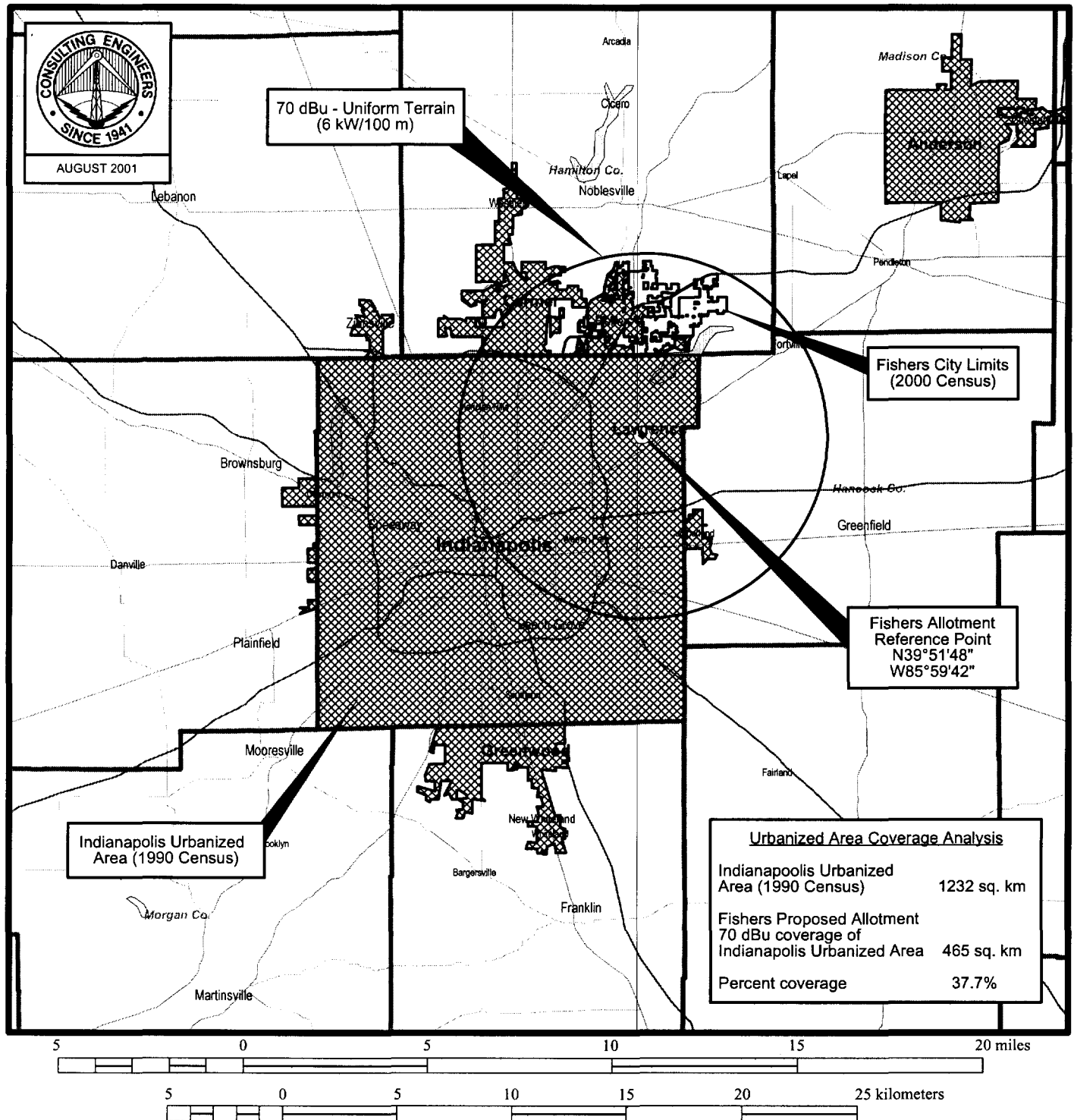


## CITY COVERAGE COMPLIANCE

STATION WGRL  
FISHERS, INDIANA  
CHANNEL 230A

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

Figure 3

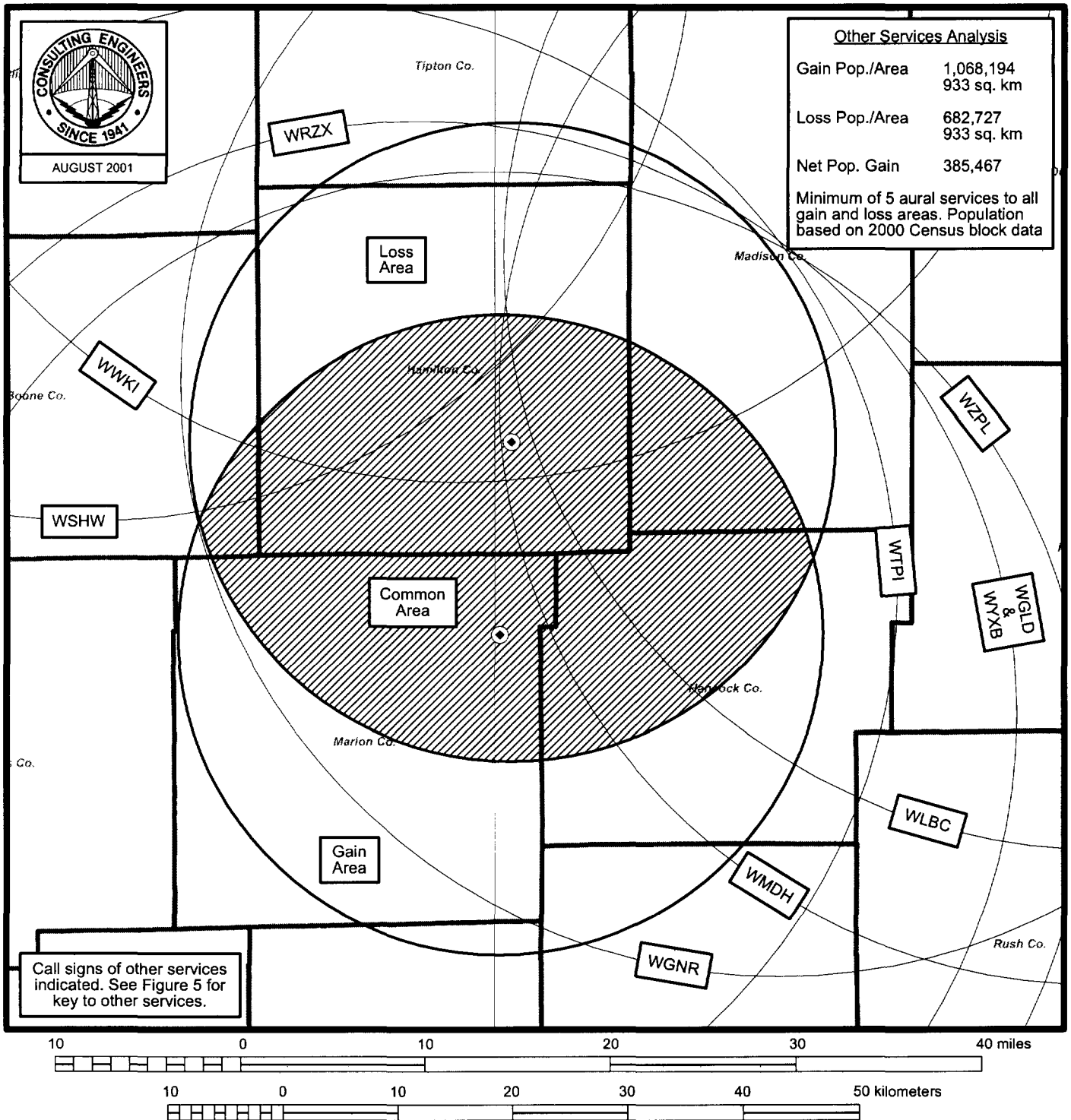


## COVERAGE OF INDIANAPOLIS URBANIZED AREA

STATION WGRJ  
FISHERS, INDIANA  
CHANNEL 230A

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

Figure 4



## OTHER AURAL SERVICES TO 60 DBU GAIN/LOSS AREA

STATION WGRl  
FISHERS, INDIANA  
CHANNEL 230A

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

Figure 5

STATIONS CONSIDERED IN EVALUATION OF  
OTHER AURAL SERVICES WITHIN FISHERS GAIN/LOSS AREA

Call Sign	City, State	Channel
WGNR (FM)	ANDERSON, IN	250B
WZPL (FM)	GREENFIELD, IN	258B
WSHW (FM)	FRANKFORT, IN	259B
WWKI (FM)	KOKOMO, IN	263B
WMDH-FM	NEW CASTLE, IN	273B
WRZX (FM)	INDIANAPOLIS, IN	277B
WLBC-FM	MUNCIE, IN	281B
WGLD (FM)	INDIANAPOLIS, IN	283B
WYXB (FM)	INDIANAPOLIS, IN	289B
WTPI (FM)	INDIANAPOLIS, IN	300B

CDBS FM SEPARATION STUDY

Job Title: Proposed WGLD, Ch. 283B, Noblesville, IN      Separation Buffer: 25 km  
Channel: 283 B      Coordinates: 395025      861034

Call Id	City St	File Status	Num	Channel Freq	ERP HAAT	DA Id	Latitude Longitude	73 215	Bear	Dist. (km)	Req. (km)
WGRL 71438	NOBLESVILLE IN	BLH LIC C	19930222KA	230 A 93.9	2.750 150	N	40-00-55 085-58-58	N	40.2	25.51 10.51	15.0 Close
0	NOBLESVILLE IN	RM DEL C	10153	230 A 93.9	0.000		40-00-55 085-58-58		40.2	25.51 10.51	15.0 Close
<i>(Original Fishers/Noblesville proposal.)</i>											
0	FISHERS IN	RM ADD C	10153	230 A 93.9	0.000		40-00-55 085-58-58		40.2	25.51 10.51	15.0 Close
<i>(Original Fishers/Noblesville proposal.)</i>											
WGRL 71438	FISHERS IN			230 A 93.9	0.000		39-51-48 085-59-42		80.5	15.71 0.71	15.0 Close
<i>(Amended allotment reference point for Fishers allotment proposal.)</i>											
WIMC 8094	CRAWFORDSVI IN	BLH LIC C	19850221KW	280 A 103.9	1.350 151	N	40-08-05 086-54-12	N	298.1	70.19 1.19	69.0 Close
WLBC-F 17602	MUNCIE IN	BLH LIC C	19990615KB	281 B 104.1	41.000 140	N	40-09-40 085-22-44	N	62.0	76.84 2.84	74.0 Close
WCBH 19050	CASEY IL	BLH LIC C	19880928KD	282 B1 104.3	11.000 151	N	39-16-24 087-55-39	N	247.8	163.16 18.16	145.0 Clear
WGLD 28609	INDIANAPOLI IN	BLH LIC C	19940920KC	283 B 104.5	50.000 150	N	39-50-25 086-10-34	N	96.7	0.00 -241.00	241.0 Short
<i>(Existing WGLD operation. Requested re-allotment of Channel 283B to Noblesville, Indiana is mutually-exclusive with the existing WGLD operation on Channel 283B in Indianapolis, Indiana.)</i>											
0	INDIANAPOLI IN	RM DEL C	10153	283 B 104.5	0.000		39-50-25 086-10-34		96.7	0.00 -241.00	241.0 Short
<i>(Original Fishers/Noblesville proposal.)</i>											
0	NOBLESVILLE IN	RM ADD C	10153	283 B 104.5	0.000		39-50-25 086-10-34		96.7	0.00 -241.00	241.0 Short
<i>(Original Fishers/Noblesville proposal.)</i>											
WLKT 29575	LEXINGTON-F KY	BLH LIC C	20000217ABS	283 C2 104.5	50.000 142		38-04-09 084-18-44		140.1	254.48 13.48	241.0 Close

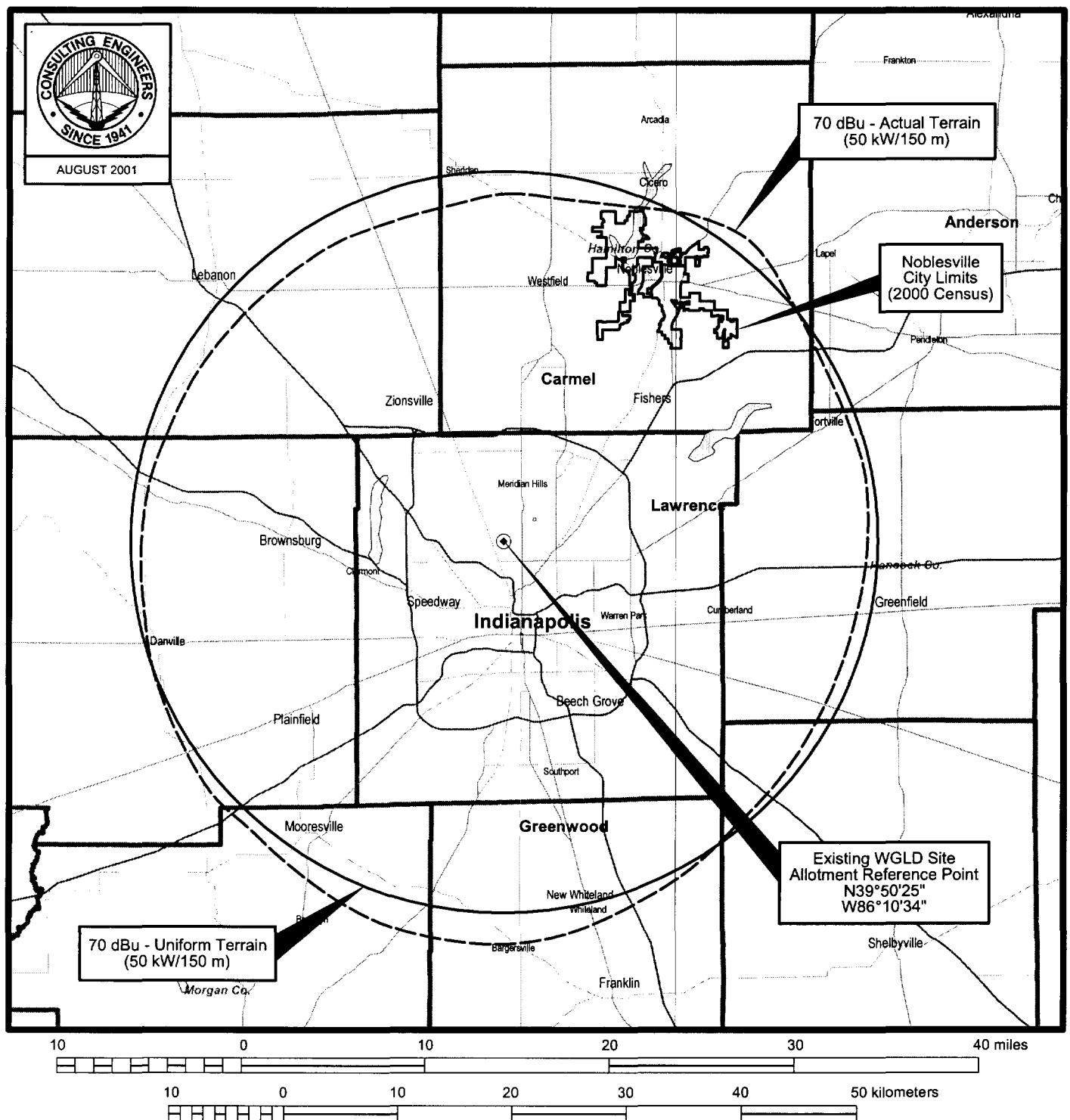
CDBS FM SEPARATION STUDY

Job Title: Proposed WGLD, Ch. 283B, Noblesville, IN      Separation Buffer: 25 km  
Channel: 283 B      Coordinates: 395025    861034

Call Id	City St	File Status	File Num	Channel Freq	ERP HAAT	DA Id	Latitude Longitude	73 215	Bear	Dist. (km)	Req. (km)
WTUE 1909	DAYTON OH CP	BPH C	19990625ID	284 B 104.7	28.000 200	N	39-43-19 084-12-36	N	93.8	168.94 -0.06	169.0 Short
<i>(Rounded to 169 km per FCC procedure.)</i>											
WTUE 1909	DAYTON OH LIC	BLH C	7790	284 B 104.7	50.000 152	N	39-43-19 084-12-36	N	93.8	168.94 -0.06	169.0 Short
<i>(Rounded to 169 km per FCC procedure.)</i>											
WITZ-F 30584	JASPER IN LIC	BLH C	6255	284 B 104.7	50.000 119	N	38-21-02 086-56-26	N	202.0	178.11 9.11	169.0 Close
WERK 1723	MUNCIE IN LIC	BLH C	19860122KD	285 A 104.9	3.000 100	N	40-09-19 085-25-48	N	60.9	72.69 3.69	69.0 Close
WWY 41891	COLUMBUS IN LIC	BLH C	19910501KA	285 A 104.9	6.000 91	N	39-11-09 085-57-37	N	165.7	74.99 5.99	69.0 Close
WGCT 33540	ELLETTSVILL IN LIC	BLH C	20000502AAN	286 A 105.1	1.700 189	N	39-11-32 086-41-46	N	211.9	84.71 15.71	69.0 Close



Figure 7



## CITY COVERAGE COMPLIANCE

STATION WGLD  
NOBLESVILLE, INDIANA  
CHANNEL 283B

du Treil, Lundin & Rackley, Inc. Sarasota, Florida